

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DATA FENCE LLC,

PLAINTIFF,

v.

TWILIO INC.,

DEFENDANT.

Civil Action No. 6:24-cv-00515-ADA

**JOINT MOTION FOR FURTHER EXTENSION OF TIME
FOR DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff Data Fence LLC (“Data Fence”) and Defendant Twilio Inc. (“Twilio”) hereby jointly move for an additional 30-day extension of time for Twilio to answer or otherwise respond to the Complaint.

Data Fence filed the Complaint on October 3, 2024. Twilio previously requested and received a 45-day extension in time to respond to the complaint, setting the current deadline on December 13, 2024. During this time, the parties have been discussing the substance of the pleadings and the claims made by Data Fence. In order to provide the parties with additional time to discuss the substance of the claims and to see if the parties can resolve the matter without additional litigation, the parties jointly request the Court provide Twilio with an additional 30 days in time to answer or otherwise respond to the complaint. With this further extension, the deadline for Twilio to respond to the complaint would be January 13, 2025. The additional time is also needed because people with relevant knowledge about the substance of claims made in the pleadings are traveling over the upcoming holidays.

For the foregoing reasons, the parties jointly request the Court grant this motion.

Dated: December 10, 2024

Respectfully,

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CERTIFICATE OF CONFERENCE

The undersigned certifies counsel conferred and Plaintiff's counsel agreed to the relief sought.

/s/ Eugene Y. Mar
Eugene Y. Mar

CERTIFICATE OF SERVICE

The undersigned certifies that on December 10, 2024 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Eugene Y. Mar
Eugene Y. Mar